

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

VICTORIA DICILLO, individually,) Case No.: 2:18-cv-00729-JCM-GWF
)
Plaintiff,)
)
v.)
)
GGP MEADOWS MALL L.L.C.;)
FOREVER 21 RETAIL, INC.; DOES I)
through X, inclusive; ROE)
CORPORATIONS XI through XX,)
inclusive,)
)
Defendants.)

PARTIES' STIPULATION TO EXTEND DISCOVERY DEADLINES

Pursuant to LR 26-4, the parties submit the following Stipulation to Extend Discovery Deadlines:

(1) Discovery Completed

The parties timely exchanged initial disclosures on or before June 1, 2018 and agreed to a mediator on or before June 29, 2018 in accordance with the Discovery Plan and Scheduling Order (Dkt. # 11). The parties have each served written discovery requests and are in the process of answering interrogatories and requests for production. An inspection of the subject product occurred on August 14, 2018.

(2) Description of Remaining Discovery

Due to ongoing fact discovery and the recent inspection of the subject product, the parties agree, and good cause exists, to extend the expert disclosure deadline currently set for August 17, 2018 and all discovery deadlines. The parties agree that to complete discovery, all discovery and case deadlines should be extended by approximately two months. The parties therefore stipulate to the following amended dates:

(3) Proposed Schedule for Remaining Discovery

Deadline	Original Deadline	New Agreed Deadline
Expert Disclosures	August 17, 2018	October 19, 2018
Rebuttal Expert Disclosures	September 19, 2018	November 19, 2018
Discovery Cut-Off	October 19, 2018	December 21, 2018
Mediation Completion	October 31, 2018	December 31, 2018
Dispositive Motions	November 19, 2018	January 21, 2018 2019
Pre-Trial Order	December 19, 2018	February 19, 2018 2019

LR 26-4 governs modifications or extensions of the Discovery Plan and Scheduling Order. The foregoing stipulation is being timely made on or before September 28, 2018 – more than 21 days before the discovery cut-off date.

DATED: August 17, 2018

<u>/s/ Joshua L. Benson</u> Joshua L. Benson, Esq. Nevada Bar No. 10514 GLEN LERNER INJURY ATTORNEYS 4795 South Durango Drive Las Vegas, NV 89147 <i>Attorneys for Plaintiff</i>	<u>/s/ Alan W. Westbrook</u> Alan W. Westbrook, Nevada #6167 Nevada State Bar No. 6167 PERRY & WESTBROOK, P.C. 1701 W Charleston Boulevard, Suite 200 Las Vegas, NV 89102 awestbrook@perrywestbrook.com and Kevin C. Schiferl (<i>pro hac vice</i>) Indiana Bar No. 14138-49 Jessica Williams Schnelker (<i>pro hac vice</i>) Indiana Bar No. 31566-49 FROST BROWN TODD LLC 201 N. Illinois Street, Suite 1900 P.O. Box 44961 kschiferl@fbtlaw.com jschnelker@fbtlaw.com <i>Attorneys for Defendants</i>
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IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: 8/20/2018

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